

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

CIVIL ACTION NO.: 1:18-cv-10819-LTS

DONNA GAVIN,
Plaintiff,

v.

BOSTON POLICE DEPARTMENT and
MARK HAYES,
Defendants.

AFFIDAVIT OF COUNSEL

I, Evan C. Ouellette, hereby depose and state as follows:

1. I am the attorney of record for the Defendant, Mark Hayes, in the above-captioned matter.
2. I am a practicing attorney in good standing in the Commonwealth.
3. Exhibit 1 to the Defendant Mark Hayes's Statement of Undisputed Material Facts in Support of His Motion for Summary Judgment is a true and accurate copy of the Plaintiff's Second Amended Complaint.
4. Exhibit 2 to the Defendant Mark Hayes's Statement of Undisputed Material Facts in Support of His Motion for Summary Judgment is a true and accurate copy of the Deposition of Plaintiff Donna Gavin.
5. Exhibit 3 to the Defendant Mark Hayes's Statement of Undisputed Material Facts in Support of His Motion for Summary Judgment is a true and accurate copy of the Deposition of Mark Hayes.

6. Exhibit 4 to the Defendant Mark Hayes's Statement of Undisputed Material Facts in Support of His Motion for Summary Judgment is a true and accurate copy of the E-Mail dated April 20, 2017.
7. Exhibit 5 to the Defendant Mark Hayes's Statement of Undisputed Material Facts in Support of His Motion for Summary Judgment is a true and accurate copy of the Deposition of Sharon Dotton.
8. Exhibit 6 to the Defendant Mark Hayes's Statement of Undisputed Material Facts in Support of His Motion for Summary Judgment is a true and accurate copy of the Deposition of Winifred Cotter.

SIGNED under the pains and penalties of perjury, this 15th day of January, 2021.

/s/ Evan C. Ouellette

Evan C. Ouellette, BBO# 655934

CERTIFICATE OF SERVICE

I hereby certify that this document was filed through the ECF system and will therefore be sent electronically to the registered participants as identified on the Notice of Electric Filing (NEF) and paper copies will be sent to those participants indicated as non-registered participants.

/s/ Evan C. Ouellette

Evan C. Ouellette, BBO# 655934

Dated: January 15, 2021